

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SHEILA PORTER,)	
Plaintiff)	
)	
v.)	
)	
ANDREA CABRAL, SUFFOLK)	
COUNTY SHERIFF'S DEPARTMENT,)	
SUFFOLK COUNTY, and)	
CORRECTIONAL MEDICAL)	
SERVICES, INC.)	
Defendants)	
)	

Civil Action No. 04-11935-DPW

**DEFENDANTS' REQUESTED
VOIR DIRE OF THE JURY**

The Defendants Andrea Cabral, Suffolk County and Suffolk County Sheriff's Department request this Honorable Court conduct the following *voir dire* of the jury pool. If any juror answers these questions in the affirmative, the Defendants request that those jurors be individually questioned regarding their impartiality as jurors:

1. Have you, any family member or close friend been held at either the Suffolk County Jail or the Suffolk County House of Correction?
2. Have you, any family member or close friend ever been committed to a correctional facility?
3. Do you know anyone that is or was employed by the Suffolk County Sheriff's Department or Correctional Medical Services?
4. Have you, a spouse, or close relation ever filed suit against a law enforcement officer or law enforcement agency?
5. Have you or any member of your family ever been discriminated against or filed a complaint of discrimination?
6. Have you, a spouse, or close relation ever been sued in a civil case by a government department or agency or brought a civil suit against a government agency?

7. Have you or any member of your family ever been discharged and/or disciplined from your place of employment?
8. Have you read any newspaper or magazine articles or seen or heard any television or radio news broadcasts concerning Sheriff Andrea Cabral or the Suffolk County Sheriff's Department?
9. Have you read any newspaper or magazine articles or seen or heard any television or radio news broadcasts concerning the subject matter of this case?
10. Do you believe your opinion of the evidence presented could be affected in any way by information you may have learned from the media pertaining to the Suffolk County Sheriff's Department or Sheriff Andrea Cabral?
11. Have you formed any opinion of Sheriff Andrea Cabral or the Suffolk County Sheriff's Department?
12. Have you formed an opinion about the professional standards at the Suffolk County Sheriff's Department?
13. Do you believe what is reported in the press is necessarily accurate?

Respectfully submitted
Andrea Cabral, Suffolk County Sheriff's
Department and Suffolk County
By their attorney

Date: January 2, 2006

/s/ Ellen M. Caulo
Ellen M. Caulo
BBO# 545250
Deputy General Counsel
Suffolk County Sheriff's Department
200 Nashua Street
Boston, MA 02114
(617) 961-6681